

PILLSBURY WINTHROP SHAW PITTMAN
LLP

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Attorneys for Plaintiff and Cross-Defendant
SCHRADER CELLARS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SCHRADER CELLARS, LLC,

Plaintiff,

vs.

ROBERT M. (RANDY) ROACH, JR.,

Defendant.

Case No. 3:21-cv-01431-SK

**SCHRADER CELLARS, LLC'S
PROPOSED VERDICT FORM**

PROPOSED VERDICT FORM

1 Plaintiff Schrader Cellars, LLC (“Schrader Cellars” or “Plaintiff”) hereby submits its
2 respective portion of the proposed verdict form.

- 3
4 1. Did Randy Roach breach a fiduciary duty owed to Schrader Cellars in a manner that was
a substantial factor in causing harm to Schrader Cellars?

5 Yes _____ No _____
6

7 *If yes, proceed to Question 2.*
8

- 9 2. What damages did Schrader Cellars incur as a result of this harm?

10 Past Economic Loss _____

11 *If you entered an amount in response to Question 2, proceed to Question 3. If you did not enter*
12 *an amount in response to Question 2, stop here, answer no further questions, and have the*
13 *presiding juror sign and date this form.*

- 14 3. Should Schrader Cellars receive prejudgment interest on its loss?

15 Yes _____ No _____
16
17
18
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23

24 _____
(Signature of jury foreperson)

_____ Date

1 DATED: February 9, 2023

/s/ Stacie O. Kinser

Stacie O. Kinser

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Stacie O. Kinser

/s/ Stacie O. Kinser